

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REMBRANDT 3D HOLDING LTD.,)	
)	
Plaintiff,)	
)	C.A. No. 23-193-JLH
v.)	
)	
TECHNOVATIVE MEDIA, INC. HAWK)	
INVESTMENT HOLDINGS LTD., AND)	
SEECUBIC, INC.,)	
)	
Defendants.)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Defendant SeeCubic, Inc. (“SeeCubic”) respectfully moves this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters:

- SeeCubic challenges Plaintiff’s privilege and confidentiality objections to RFP Nos. 17-19, 45-47 and seeks the production of documents and information withheld on the basis of such objections.
- SeeCubic seeks supplemental responses to SeeCubic’s Interrogatory Nos. 1-2, and 4.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date: March 26, 2025

Delaware Counsel for Plaintiff: Andrew P. DeMarco
Lead Counsel for Plaintiff: Christopher A. Michaels, Neil Wallace

Delaware and Lead Counsel for Defendant SeeCubic, Inc.: Benjamin J. Schladweiler, Renée Mosley Delcollo

The parties are available for a teleconference on the following dates: April 8, 10, 11 or

GREENBERG TRAURIG, LLP

/s/ Renée Mosley Delcollo

Benjamin J. Schladweiler (#4601)

Lisa M. Zwally (#4328)

Renée Mosley Delcollo (#6442)

222 Delaware Avenue, Suite 1600

Wilmington, DE 19801

(302) 661-7000

schladweilerb@gtlaw.com

lisa.zwally@gtlaw.com

renee.delcollo@gtlaw.com

Attorneys for Defendant SeeCubic, Inc.

Dated: April 1, 2025